

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
GULFPORT DIVISION

IN RE:	)	BANKRUPTCY CASE
	)	
RODNEY JOSEPH DYESS,	)	NO.: 25-50713-KMS
CANDACE JANETTE DYESS,	)	
	)	CHAPTER 13
Debtors.	)	
	)	
	)	
	)	

OBJECTION TO CONFIRMATION

COMES NOW U.S. Bank National Association, not in its individual capacity but solely in its capacity as Indenture Trustee of CIM Trust 2020-R1 (hereinafter known as "Creditor"), a secured creditor holding a Deed of Trust against the real property commonly known as 648 Henley Field Mcneill, Carriere, MS 39426 (the "Property"), and for the reasons stated below, objects to confirmation of Debtors' Chapter 13 plan (Doc. No. 2) (the "Plan").

1.

Debtors' Plan provides that post petition payments are to resume February 2024 and arrears to go through January 2024, however the Bankruptcy was filed February 14, 2025. This provision is incorrect.

2.

Debtors' Plan underestimates the prepetition arrearage claim owed to Creditor as \$16,723.54. The actual prepetition arrearage amount owed to Creditor as per its Proof of Claim (34-1) filed in this case on July 21, 2025, is \$17,640.85.

3.

Confirmation of the Plan should be denied until Debtors amend the Plan to properly treat Creditor's claim.

4.

Creditor reserves the right to raise any failure of Debtor to timely make all payments under the Plan or required by the Plan, if at the time of the confirmation hearing that appears to be the case.

WHEREFORE, Creditor prays that the Court will:

1. deny confirmation,
2. award reasonable attorney's fees, and
3. grant such other and further relief as is just and equitable.

/s/Karen A. Maxcy

Karen A. Maxcy  
Mississippi BAR NO. 8869  
Attorney for Creditor  
McCalla Raymer Leibert Pierce, LLP  
1544 Old Alabama Road  
Roswell, GA 30076  
770-643-7200

**CERTIFICATE OF SERVICE**

I, Karen A. Maxcy, of McCalla Raymer Leibert Pierce, LLP, do hereby certify that on this date, I served a copy the above OBJECTION TO CONFIRMATION filed in this bankruptcy matter on the following parties at the addresses shown, through the Court's ECF/CMF system, and/or via U.S. Mail First Class, postage prepaid and properly addressed, to-wit:

Rodney Joseph Dyess  
648 Henley Field McNeill Rd  
Carriere, MS 39426

Candace Janette Dyess  
648 Henley Field McNeill Rd  
Carriere, MS 39426

Thomas Carl Rollins,  
The Rollins Law Firm, PLLC  
PO BOX 13767  
Jackson, MS 39236

*(served via ECF Notification)*

Warren A. Cuntz T1, Jr.  
P. O. Box 3749  
Gulfport, MS 39505-3749

CERTIFIED, this 25th day of July, 2025

/s/Karen A. Maxcy  
Karen A. Maxcy